Simplot Responses to Agencies' Comments (May 31, 2017)
"Draft Dinwoody Material Source Investigation Work Plan,
Smoky Canyon Mine RI/FS" (March 2017)

Specific Comments:

SC-1 ***Section 1.2, Page 5, Types of Dinwoody, 2nd paragraph****: This paragraph discusses two types of Dinwoody. Please indicate the quantitative or qualitative methods and limits that will distinguish the two types.*

Response: A highly repeatable qualitative approach is utilized for distinguishing the type of Dinwoody. The degree of weathering is key to identifying the type of Dinwoody that makes suitable cover material. Since 2011, Mine personnel have been successfully locating, segregating, and stockpiling Types A, B, and C Dinwoody. Markers that indicate the type of Dinwoody include strength or the degree of degradation and color. Of these, color is the most notable alteration defining the type of Dinwoody. Weathered Dinwoody is brown to olive green and un-weathered Dinwoody is grey and has a "blocky" structure. The un-weathered Dinwoody is more intact and harder than the material that would be used for cover material. The Type B Dinwoody is a transition zone between the weathered and un-weathered Dinwoody which contains properties of both. Although plasticity is a good indicator for quality, it is not a practical identifier for selection of material during the construction process. Although detailed logs of the material will be made for the investigation and may include other parameters, it is imperative that a simple and broad, yet reliable, approach be taken when excavating the borrow material for use in a cover. As noted above, the target Type A Dinwoody material is brown to olive green in color and weathered. This information has been added to the Work Plan.

SC-2 ***Section 1.2, Page 5, Types of Dinwoody, 2nd paragraph:*** *This paragraph discusses two types of Dinwoody. Please describe how or why the Type A is of higher quality material.*

Response: Type A Dinwoody has a significantly higher clay content and fewer irregular and larger particles. Several test pads were constructed from 2008 through 2011 to test the various types (grades) of Dinwoody. Extensive testing of these test pads included density and moisture measurements, particle size distribution tests, and borehole permeameter tests that provided background for determining the characteristics of different types of Dinwoody. The Type A Dinwoody performed significantly better than the Type B material. This information has been added to the Work Plan.

SC-3 ***Section 1.3, Page 5, Objectives, 1st paragraph:*** *The text references the*

Formation 2016 report. Did this report cover site wide or the Panel D borrow areas that were used in the NTCRA project for the Pole Canyon ODA?

Response: The Formation 2016 document was prepared for the site-wide investigation of potential Dinwoody borrow source areas – the subject of this Work Plan. The 2016 document (CERCLA Cover Material Source Evaluation Technical Memorandum) did not cover the Panel D Dinwoody borrow area developed for the Pole Canyon ODA cover NTCRA in 2015.

SC-4 ***Section 1.4, Page 7, Work Plan Organization, 1st paragraph:*** *This section should be placed as 1.1 to describe the body of the report. This section seems out of place 7 pages into the report.*

Response: As requested, the information on the contents of the Work Plan have been moved to earlier in the document.

SC -5 ***Section 2.1, Page 8, Boring and/or Test Pit Development:*** *Please indicate whether Simplot, or their contractor or consultant will be doing the development activities.*

Response: Simplot plans to perform the development work in-house. If resources become limited, Simplot will hire and manage an equipment contractor to complete the work; however, either a Simplot Geologist or Mining Engineer will be managing the operation and sample collection efforts. This information has been added to the Work Plan.

SC-6 ***Section 2.1, Page 8, Boring and/or Test Pit Development, 1st paragraph:*** *The report doesn't describe what method of volume calculation will be used. It is assumed that depth and a DEM will be used. If other methods are used will there be sufficient bore holes/test pits to create adequate sections for volume calculations?*

Response: Exploration sites were selected such that at least three points in each study area would be available to create a triangulation surface for the bottom of the Dinwoody borrow. The triangulation surface, surface topography, and top soil triangulation files will all be utilized with slope constraints to calculate volumes of suitable material in each investigation area. This information has been added to the Work Plan.

SC-7 ***Section 2.1, Page 9, Types of Dinwoody, Table 2-1:*** *Place note super scripts in the table unless it is a general note to the whole table.*

Response: As requested, a superscript has been added to the table for the included note.

SC-8 ***Section 2.2, Page 9, Data Collection and Completing Investigation Locations, 2nd paragraph:*** *Please indicate who will be providing the on-site geologist or mine engineer.*

Response: Simplot will provide the on-site Geologist and Mine Engineer. Katie Wilkes will be the lead Geologist for the project. Grant Williams and Andrew Herrera will be the Mine Engineers who will assist with completing the drilling project and borrow design evaluation. This information has been added to the Work Plan.

SC-9 ***Section 2.2, Page 9, Data Collection and Completing Investigation Locations, 2nd paragraph:*** *Samples from the testing locations should be collected as part of the logging process and part of the data collection and archive step. Please indicate this in the text.*

Response: Physical samples will not be retained as part of the investigation work, although detailed logs of material and depth will be completed at the time of excavation or drilling. Detailed photo documentation of cuttings or excavated material and trench walls will be retained with the logs for future reference. This information has been added to the Work Plan.

SC-10 ***Section 2.2, Page 9, Data Collection and Completing Investigation Locations, 2nd paragraph:*** *Please indicate if topographical or aerial surveys will be done as part of data collection for the volume calculations.*

Response: An aerial survey of the Mine site and directly adjacent property occurs every fall. The most recent flight topography will be used along with survey data of the investigation sites provided by Simplot personnel. This information has been added to the Work Plan.

SC-11 ***Section 1.3, Pages 6-7, Figures 1-3 and 1-4*** *look like they were in one of the previous reports. Please update the pictures to current conditions.*

Response: The photos provided in Figures 1-3 and 1-4 are the best photos available to illustrate the Dinwoody material types. Although presented in previous reporting, these photos are still the most relevant photos available and has been retained.

SC-12 ***Page 8, Section 2.1, Boring and/or Test Pit Development, 2nd Paragraph.*** *The proposed drilling depths, for estimating available volumes of both A and B types of Dinwoody, are between 35 and 50 feet, but the A type Dinwoody is +/- 40 feet deep on average. So at a maximum drill depth of 50 feet, it will show the boundary between A and B, allowing an estimate of the Type A volume. However, this will not show the bottom of Type B in most places. Please clarify*

how this approach will allow an estimate of the volume of Type B material.

Response: Type A Dinwoody is the key material targeted in this investigation. Preliminary evaluations show that there should be enough Type A Dinwoody in the potential borrow areas to complete potential future cover projects. Type B Dinwoody is a transition zone between the weathered and un-weathered Dinwoody which contains properties of both. When half or the majority of material at a particular depth is un-weathered, it is determined to be no longer useable. If this transition is not reached within the test pit or boring depth, it will be assumed that no deeper material will be suitable for volume estimation purposes. This information has been added to the Work Plan.